RECENT IMPORTANT DECISIONS.

ADVERSE POSSESSION—AS AGAINST THE PROPERTY OF ONE STATE LOCATED IN A SISTER STATE.—The city of Baltimore, Maryland, had acquired by devise an interest in certain land in the state of Louisiana, to be used for and only for the education of the public poor; in an action by the city of Baltimore and its co-owners to recover possession of said land, the defendants claimed title in themselves by adverse possession for the statutory period as prescribed by the law of Louisiana. *Held,* that the city of Baltimore was barred by the statute. *City of New Orleans et al.* v. *Salmen Brick & Lumber Co.* (La. 1914), 66 So. 237.

The interesting point suggested by the case and passed upon by the court is whether a statute of Louisiana exempting all public property owned by the state from taxation and the operation of the statute of limitations is applicable in favor of a sister state owning land within the territory of the former state? The court in its first opinion decided the question in the affirmative. The decision of this point is not supported by any direct authority and the court attempts to justify its holding by analogy and implication, *i. e.,* that inasmuch as public property used for public purposes situated in one state and owned by a sister state is exempt from taxation, then by necessary implication it is exempt also from the operation of the statute of limitations with reference to prescription, etc. *Stoutz* v. *Brown,* 5 Dill. 445, Fed. Cas. 13505; extending the doctrine of *People* v. *Brooklyn Assessors,* 111 N. Y. 505; and *Sumner County Comm.* v. *City of Wellington,* 66 Kan. 590. On rehearing of the principal case, however, the court reversed itself on another ground, holding that the property in question was not exempt from acquisition by prescription, on the theory that the property in question was not public property devoted to a public use. That this holding is subject to question, see *Nashville* v. *Smith,* 86 Tenn. 213; *State Jersey City Water Comm.* v. *Gaffney,* 34 N. J. L. 131; and *Adm. of Tulane Ed. Fund* v. *Board of Assessors,* 38 La. Ann. 292, which appear to be directly contra.

BANKRUPTCY—ALLOWANCE TO WIDOW AND CHILDREN.—The right of the widow and children of a deceased bankrupt, under § 8 of the Bankruptcy Act of 1898, to any allowance which, upon his death, they were entitled to from his estate under the laws of the state of his residence, *held,* not to be lost because the title to the bankrupt estate had vested in the trustee in bankruptcy under § 70 of the bankruptcy act prior to the death of the bankrupt; but the assets remaining in the hands of the trustee at the bankrupt's death are chargeable with the payment of such allowance. *Hull* v. *Hicks,* 35 Sup. Ct. 152.

Defendant's counsel contended that § 8 of the bankruptcy act does not create a right, but merely preserves the right given by the state law to have a year's support "out of the estate" left by the husband and father, and that